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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

303

In Re: Matter of)	
)	
Amendment of Section 73.202(b),)	MM Docket No. 00-
Table of Allotments,)	RM-
FM Broadcast Stations.)	
)	
(Naches, Sunnyside and Benton City, WA))	

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

Butterfield Broadcasting Corporation ("Butterfield"), pursuant to Section 1.401(a) of the Commission's rules, hereby respectfully requests that Section 73.202(b) of the Commission's rules (the FM Table of Allotments) be amended as follows:

<u>Community</u>	<u>Existing</u>	<u>Proposed</u>
Naches	245A, 257A	245C2, 257A
Sunnyside	244A	-----
Benton City	---	244A

Concurrent with this relief, Butterfield further requests that the license of station KZTA (FM), Naches, Washington be modified to specify operation on Channel 245C2 in lieu of Channel 245A and that the license of station KZTB (FM), Channel 244A, be modified to specify a community of license of Benton City in lieu of Sunnyside, Washington. Butterfield is licensee of both stations.

In support whereof, the following is respectfully shown:

1. Submitted herewith is an engineering statement of Hatfield & Dawson, demonstrating that the relief requested herein will meet all applicable FCC requirements with respect to city coverage and channel spacing. The engineering statement further demonstrates that

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the reallocations proposed herein would result in a preferential arrangement of allotments pursuant to the Commission's change of community procedures. Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989), recon. granted in part, 5 FCC Rcd 7094 (1990).

2. The proposed change for KZTA will result in an upgrade from Class A to Class C2 service. The Class C2 service contour will encompass entirely the current Class A contour. Accordingly, there will be no loss of reception service. There will be a gain area of 6,043 square kilometers having a 1990 Census population of 42,888 persons. As the channel will still be allotted to Naches, there will be no gain or loss in local transmission service.

3. The proposed change for KZTB will provide Benton City with its first local service. Benton City was incorporated in 1945 and had a 1990 Census population of 1,806. Benton City has a mayor and city council form of government. There is a local Benton City post office with its own zip code (99320). Its schools are part of the Kiona-Benton City school district. There is a city water system and a local monthly newspaper, the Benton City Bulletin, with a paid circulation of 3,700. Benton has a variety of retail services and employers. We respectfully submit that Benton City is an independent community deserving of its first local transmission service. In contrast, we note that Sunnyside will retain full time local service from non-commercial educational FM station KAYB, 88.1 MHz, and from commercial station KZTS, 1210 kHz (also licensed to Butterfield).

4. With respect to the reception aspect of the KZTB proposal, we respectfully note that the gain and loss areas are equal (2,297 square kilometers) but that the 1990 census population of 127,489 in the gain area will more than offset the 54,092 persons in the loss area. Even so, the KZTA upgrade will provide new service to a portion of the KZTB loss area. We further note that the entire KZTB loss area is well served, and therefore no white, gray or underserved areas will result. The instant proposals will result in a net gain area of 6,043 square kilometers and 116,285 persons.

5. As further described in the attached engineering statement, the proposals will eliminate an existing grandfathered short spacing between stations KZTA and KZTB and will permit KZTB to operate with a radiation center at a transmitter site elevated above average terrain and thereby improve its technical service.

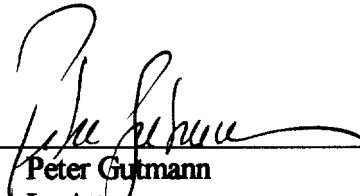
6. In sum, the reallocations proposed herein will result in a first local service for Benton City, an extension of KZTA's service to 42,888 persons, improved coverage for KZTB and elimination of the existing grandfathered short spacing between KZTA and KZTB. These public interest benefits are more than sufficient to outweigh the removal of a third local service from the community of Sunnyside and the creation a loss area all of which is well-served and substantially less than the resultant gain area. Accordingly, we respectfully submit that the allocations proposed herein serve the public interest and should be implemented.

7. Butterfield states herewith its present intention to promptly apply for and construct the requested facilities, if allotted.

Respectfully submitted,

BUTTERFIELD BROADCASTING CORPORATION

By: _____


Peter Gutmann
Its Attorney

PEPPER & CORAZZINI
1776 K Street, NW
Suite 200
Washington, DC 20006
(202) 296-0600

November 29, 2000

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JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE
DAVID J. PINION, PE
PAUL W. LEONARD, PE
ERIK C. SWANSON
THOMAS S. GORTON

HATFIELD & DAWSON
CONSULTING ELECTRICAL ENGINEERS
9500 GREENWOOD AVE. N.
SEATTLE, WASHINGTON 98103

TELEPHONE
(206) 783-9151
FACSIMILE
(206) 789-9834
E-MAIL
hatdaw@hatdaw.com
MAURY L. HATFIELD, PE
CONSULTANT
Box 1326
ALICE SPRINGS, NT 5950
AUSTRALIA

ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 245C2
FOR USE AT NACHES, WASHINGTON

TO ASSIGN FM CHANNEL 244A
FOR USE AT BENTON CITY, WASHINGTON

BUTTERFIELD BROADCASTING CORPORATION

11/2000

Engineering Statement

This Engineering Statement has been prepared on behalf of Butterfield Broadcasting Corporation ("Butterfield"), licensee of stations KZTA 245A Naches and KZTB 244A Sunnyside, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Substitute Channel 245C2 for Channel 245A at Naches, Washington, and modify the license of station KZTA to specify operation on the upgraded channel, and
- 2) Reallot Channel 244A from Sunnyside to Benton City, Washington, and modify the license of station KZTB to specify operation at Benton City.

The proposed reallocation plan will provide several benefits:

- 1) The existing §73.213(c)(2) grandfathered short-spacing between KZTA and KZTB will be eliminated.
- 2) KZTA will be able to upgrade to Class C2, and thus will be able to provide enhanced service to Naches and a broader listening area.
- 3) Benton City, an incorporated city with a 1990 Census population of 1806 persons, will receive its first local service.
- 4) A total of 157,055 persons will receive an additional aural service.
- 5) In accommodating the benefits listed above, no white, gray, or underserved areas will be created.

Hatfield & Dawson Consulting Engineers

Channel 245C2 at Naches

As outlined in the attached channel study, Channel 245C2 can be assigned for use at Naches in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 244A is reallocated to Benton City. For this study the coordinates of the KREW 257A Naches operation on Pine Mountain (NL 46° 36' 02" x WL 120° 52' 06") have been used. This site is 20 kilometers from Naches, the coordinates of which are NL 46° 43' 52" x WL 120° 41' 54". The nominal distance to the 70 dBu F(50,50) contour for a Class C2 station is 32.6 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Naches.

Channel 244A at Benton City

As outlined in the attached channel study, Channel 244A can be assigned for use at Benton City in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of a site on Goose Hill (NL 46° 14' 48" x WL 119° 25' 40") have been used. This site is 5 kilometers from Benton City, the coordinates of which are NL 46° 15' 48" x WL 119° 29' 12". The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Benton City.

The proposed allotment of Channel 244A at Benton City will provide the first local service to that community. Sunnyside will retain full-time local service from stations KAYB Channel 201A and KZTS 1210 kHz.

Hatfield & Dawson Consulting Engineers

Gain and Loss Areas

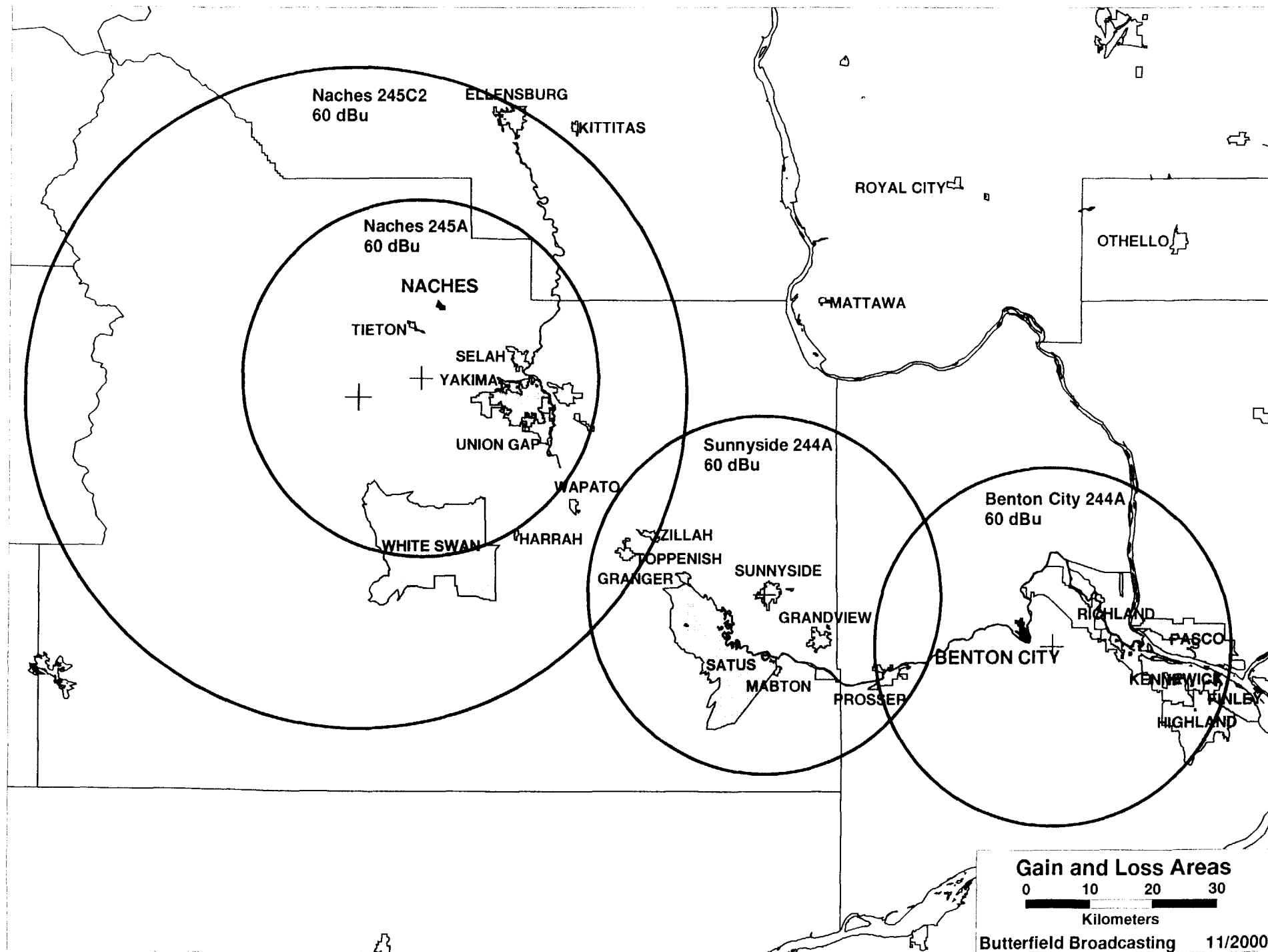
The 60 dBu contour of Channel 245C2 at Naches completely encompasses the 60 dBu contour of the present Channel 245A operation at Naches. Therefore, there will be no loss areas directly associated with that upgrade. The gain area directly associated with the upgrade at Naches encompasses 6,043 km² and a 1990 Census population of 42,888 persons.

The reallocation of Channel 244A from Sunnyside to Benton City will involve a transmitter site change. The gain area will encompass 2,297 km² and a 1990 Census population of 127,489 persons. The loss area will encompass 2,297 km² and a 1990 Census population of 54,092 persons.

The upgrade at Naches will provide 60 dBu service to a portion of the Sunnyside loss area. Taken as a whole, the proposed reallocation plan will result in a gain area encompassing 8,142 km² and a 1990 Census population of 157,055 persons, and a loss area encompassing 2,099 km² and a 1990 Census population of 40,770 persons. The attached table and map exhibit depict the gain and loss areas associated with this proposal.

Table of Gain and Loss Areas

Channel	Area and Population Served	
A. Naches 245A	2,515 km ²	122,449 persons
B. Naches 245C2	8,558 km ²	165,337 persons
C. Sunnyside 244A	2,515 km ²	60,656 persons
D. Benton City 244A	2,515 km ²	134,053 persons
E. Sunnyside 244A and Benton City 244A Common Area	218 km ²	6,564 persons
F. Sunnyside 244A and Naches 245C2 Common Area	198 km ²	13,322 persons
Total Loss Area equals C - E - F	2,099 km ²	40,770 persons
Total Gain Area equals (B - A - F) + (D - E)	8,142 km ²	157,055 persons



Gain and Loss Areas

0 10 20 30

Kilometers

The proposed reallocation plan will not result in the creation of any white or gray areas. Each of the following stations provides 60 dBu service to 100% of the loss area¹:

KATS(FM)	233C1 Yakima, WA
KARY(FM)	265C2 Grandview, WA
KXDD(FM)	281C1 Yakima, WA
KFFM(FM)	297C Yakima, WA

Neither will the proposed reallocation plan result in the creation of any underserved areas. The entire loss area will continue to receive aural service from at least five stations. In addition to the four stations listed above, service to the loss area is provided by 21 FM stations:

KAYB(FM)	201A Sunnyside, WA
KFAE(FM)	206C Richland, WA
KSOH(FM)	208C2 Wapato, WA
KNWY(FM)	212C2 Yakima, WA
KYPL(FM)	216C2 Yakima, WA
KDNA(FM)	220C1 Yakima, WA
KQSN(FM)	225C2 Toppenish, WA
KIOK(FM)	235C Richland, WA
KXLE(FM)	237C2 Ellensburg, WA
KRCW(FM)	242C2 Royal City, WA
KEYW(FM)	252C2 Pasco, WA
KLES(FM)	254C2 Mabton, WA
KHHK(FM)	259C2 Yakima, WA
KMNA(FM)	269C2 Prosser, WA
KPQ(FM)	271C Wenatchee, WA
KORD(FM)	274C Richland, WA
KQBE(FM)	276C2 Ellensburg, WA
KMCQ(FM)	283C The Dalles, OR
KONA(FM)	287C Kennewick, WA
KRSE(FM)	289C1 Yakima, WA
KEGX(FM)	293C Richland, WA

¹In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour.

Additional service to the loss area is provided by several AM stations. A list of those stations can be provided should the Commission so require.

Tuck Analysis

No change in community of license is proposed for Channel 245C2 at Naches. The allotment of Channel 244A at Benton City will provide 70 dBu service to just 36% of the Richland-Kennewick-Pasco Urbanized Area. Benton City is not located within the Richland-Kennewick-Pasco Urbanized Area. Based upon these circumstances, no "Tuck" analysis is believed to be required in support of the proposed reallocation plan.

Elimination of an Existing Grandfathered Short-Spacing

Stations KZTA 245A Naches and KZTB 244A Sunnyside are first-adjacent-channel stations whose transmitter sites are presently located just 64.63 kilometers apart. §73.207 of the Commission's Rules requires that first-adjacent-channel Class A stations be located a minimum of 72 kilometers apart. KZTA and KZTB presently operate as grandfathered short-spaced stations under §73.213(c)(2) of the Commission's Rules.

Both KZTA and KZTB have by mutual consent received authorization for 6 kW Class A facilities under §73.213(c)(2). However, the short-spacing continues to result in significant interference between the two first-adjacent-channel stations. Not only will grant of the reallocation plan proposed herein provide a first local service to Benton City and permit the upgrade of KZTA to Class C2, but it will also eliminate the grandfathered short-spacing which

exists between KZTA and KZTB, reducing and possibly even eliminating the interference which the two stations currently cause to each other.

It should be noted that the elimination of the short-spacing will also provide a significant improvement for KZTB, which has been limited to a low-lying transmitter site relative to the surrounding terrain. In fact, KZTB is presently authorized to operate with a radiation center at 0 (zero) meters above average terrain. The reallocation of Channel 244A from Sunnyside to Benton City will allow KZTB to operate from an elevated transmitter site and provide improved wide-area coverage.

Hatfield & Dawson Consulting Engineers

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 245C2 96.9 MHz

Page 1

Latitude: 46 36 2

Longitude: 120 52 6

Safety Zone: 50 km

Job Title: Naches 245C2 at Pine Mountain

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KYPT LIC	SEATTLE WA	BLH-880705KA	243C 96.5	100.000 373.0	47-32-39 122-06-32	318.6	141.01 36.01	105 CLEAR
KWWW-FM LIC	QUINCY WA	BLH-940502KC	244A 96.7	0.440 315.0	47-19-13 119-48-00	45.0 SS	114.08 8.08	106 CLOSE
KZTB LIC	SUNNYSIDE WA	BMLH-940209KF	244A 96.7	5.800 -1.0	46-19-10 120-01-28	115.5	71.97 -34.03	106 SHORT
KZTB CP	SUNNYSIDE WA	BPH-970912IE	244A 96.7	6.000 0.0	46-19-10 120-01-28	115.5	71.97 -34.03	106 SHORT
KGY-FM LIC	MCCLEARY WA	BLH-921109KE	245C3 96.9	2.350 322.0	47-05-08 123-11-19	287.8	185.02 8.02	177 CLOSE
KZTA LIC	NACHES WA	BLH-910506KA	245A 96.9	5.800 11.0	46-41-40 120-41-01	53.4	17.58 -148.42	166 SHORT
KZTA CP	NACHES WA	BPH-950509IG	245A 96.9	0.290 318.0	46-37-39 120-44-17	73.2	10.42 -155.58	166 SHORT
KZTA CP	NACHES WA	BPH-970415IC	245A 96.9	0.530 324.0	46-37-39 120-44-17	73.2	10.42 -155.58	166 SHORT
KKSN-FM LIC	PORTLAND OR	BLH-900821KA	246C 97.1	100.000 386.0	45-29-20 122-41-40	229.4	187.74 -0.26	188 SHORT
KKSNaux LIC	PORTLAND OR	BLH-950606KD	246C 97.1	40.000 305.0	45-29-20 122-41-40	229.4	187.74 0.00	0 AUX
KXRNaux LIC	WALLA WALLA WA	BLH-980813KA	246C 97.1	0.130 DA -57.0	46-13-41 119-07-08	106.5	140.74 0.00	0 AUX
KXRNaux LIC	WALLA WALLA WA	BLH-7497	246C 97.1	50.000 408.0	45-59-04 118-10-08	107.3	218.99 30.99	188 CLEAR

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 245C2 96.9 MHz

Page 2

Latitude: 46 36 2

Longitude: 120 52 6

Safety Zone: 50 km

Job Title: Naches 245C2 at Pine Mountain

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KBSG-FM LIC	TACOMA WA	BLH-891018KC	247C 97.3	55.000 729.0	47-30-14 121-58-29	320.6	130.97 25.97	105 CLEAR
KBSGaux CP	TACOMA WA	BPH-990528IM	247C 97.3	50.000 388.0	DA 47-32-35 122-06-25	318.6	140.82 0.00	0 AUX
KBSGaux CP	TACOMA WA	BPH-990714IG	247C 97.3	54.000 226.0	DA 47-18-14 122-23-43	304.6	140.09 0.00	0 AUX

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

KZTA-H HYP	NACHES WA	-PLANNED	245C2 96.9	0.000 0.0	46-37-50 120-45-13	69.1	9.40 -180.60	190 SHORT
KZTB-H HYP	BENTON CITY WA	-PLANNED	244A 96.7	0.000 0.0	46-14-48 119-25-40	109.1	117.52 11.52	106 CLEAR

===== END OF FM SPACING STUDY FOR CHANNEL 245 =====

SEARCH PARAMETERS

FM Database Date: 001010

Channel: 244A 96.7 MHz
 Latitude: 46 14 48
 Longitude: 119 25 40
 Safety Zone: 50 km
 Job Title: Benton City 244A

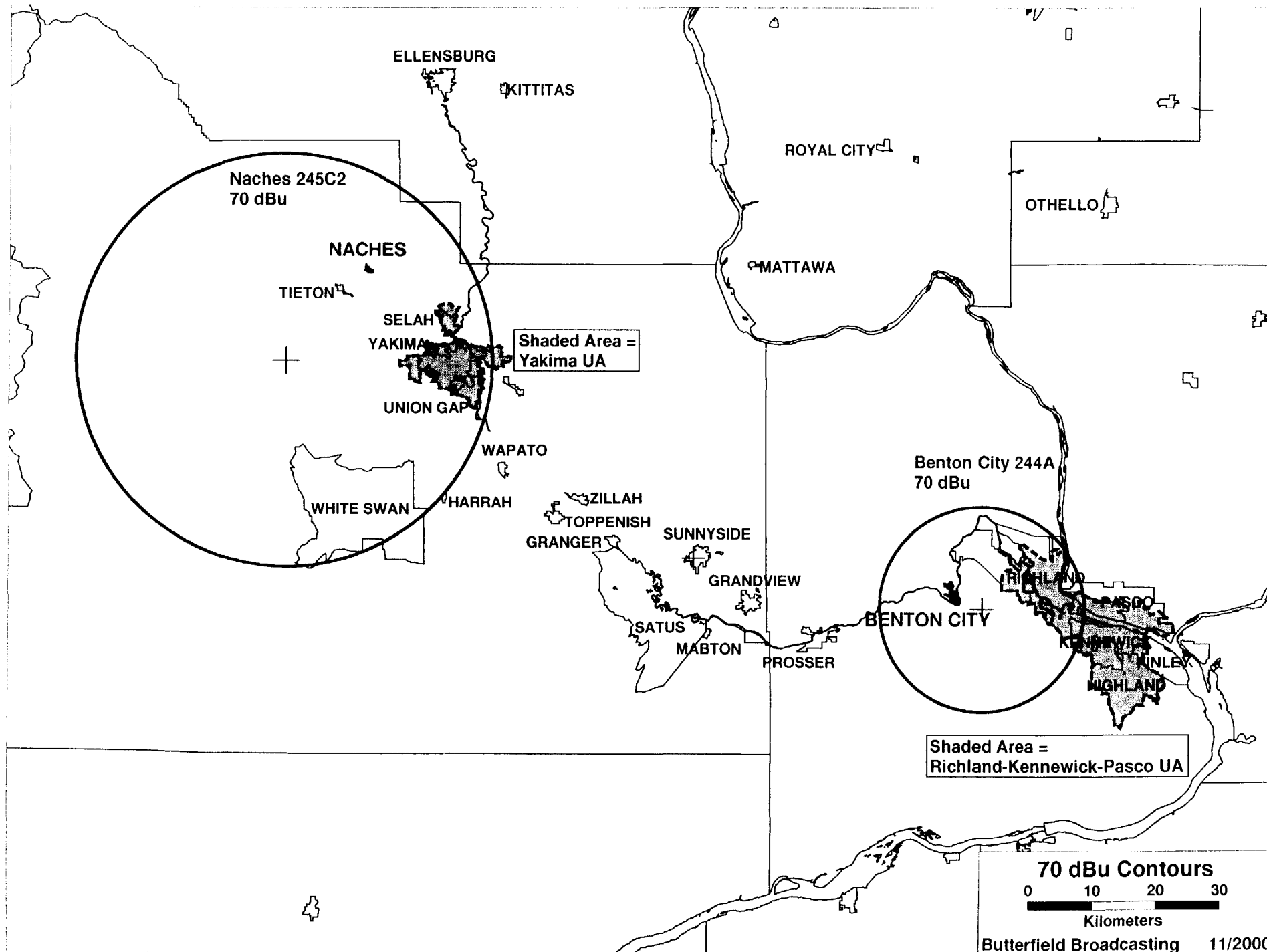
Page 1

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KRCW VACANT	ROYAL CITY WA -		242C2 96.3	0.000 0.0	46-45-55 119-16-51	11.0	58.74 3.74	55 CLOSE
KRCW LIC	ROYAL CITY WA BLH-90910AAE		242C2 96.3	19.500 241.0	46-45-55 119-16-51	11.0	58.74 3.74	55 CLOSE
KWPK LIC	WARM SPRINGS OR BLH-860127KG		243C 96.5	100.000 332.0	44-50-24 121-13-56	222.6	210.48 45.48	165 CLEAR
KWWW-FM LIC	QUINCY WA BLH-940502KC		244A 96.7	0.440 315.0	47-19-13 119-48-00	346.8 SS	122.69 7.69	115 CLOSE
KZTB LIC	SUNNYSIDE WA BMLH-940209KF		244A 96.7	5.800 -1.0	46-19-10 120-01-28	280.2	46.69 -68.31	115 SHORT
KZTB CP	SUNNYSIDE WA BPH-970912IE		244A 96.7	6.000 0.0	46-19-10 120-01-28	280.2	46.69 -68.31	115 SHORT
KZTA LIC	NACHES WA BLH-910506KA		245A 96.9	5.800 11.0	46-41-40 120-41-01	297.8	108.54 36.54	72 CLEAR
KZTA CP	NACHES WA BPH-950509IG		245A 96.9	0.290 318.0	46-37-39 120-44-17	293.3	109.24 37.24	72 CLEAR
KZTA CP	NACHES WA BPH-970415IC		245A 96.9	0.530 324.0	46-37-39 120-44-17	293.3	109.24 37.24	72 CLEAR
KXRXaux LIC	WALLA WALLA WA BLH-980813KA		246C 97.1	0.130 DA -57.0	46-13-41 119-07-08	94.9	23.92 0.00	0 AUX
KXRX LIC	WALLA WALLA WA BLH-7497		246C 97.1	50.000 408.0	45-59-04 118-10-08	106.3	101.59 6.59	95 CLOSE

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

None VACANT	STANFIELD OR AUC-37		241C3 96.1	0.000 0.0	45-40-40 119-23-01	176.9	63.32 21.32	42 CLEAR
KZTA-H HYP	NACHES WA -PLANNED		245C2 96.9	0.000 0.0	46-36-02 120-52-06	290.1	117.52 11.52	106 CLEAR
KZTB-H HYP	BENTON CITY WA -PLANNED		244A 96.7	0.000 0.0	46-14-48 119-25-40	0.0	0.00 -115.00	115 SHORT

===== END OF FM SPACING STUDY FOR CHANNEL 244 =====



Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Benton City, Naches, and Sunnyside, Washington, has been prepared on behalf of Butterfield Broadcasting Corporation. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 22nd day of November, 2000.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers